

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LA UNION DEL PUEBLO ENTERO, et al., §
 §
 §
 §
v. §
 §
GREGORY ABBOTT, et al. §
 §
 §**

**5:21-CV-0844-XR
(Consolidated Cases)**

**DEFENDANT TRAVIS COUNTY DISTRICT ATTORNEY JOSÉ GARZA’S
UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
PLAINTIFFS’ LULAC TEXAS, VOTO LATINO, TEXAS ALLIANCE FOR RETIRED
AMERICANS AND TEXAS AFT’S SECOND AMENDED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF [ECF NO. 207]**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant Travis County District Attorney José Garza (“District Attorney Garza”) and files this Unopposed Second Motion for Extension of Time to File Response to LULAC Plaintiffs’ Second Amended Complaint (ECF No.207) and in support thereof states as follows:

I.

LULAC Plaintiffs filed their Second Amended Complaint for Declaratory and Injunctive Relief on January 25, 2022 (ECF No. 207). District Attorney Garza was served with the Second Amended Complaint on February 4, 2022, making his original answer due February 25, 2022. The Court granted a first extension of time (ECF No. 289), making the current deadline for his response to the Second Amended Complaint March 4, 2022.

District Attorney Garza respectfully requests that the Court grant a five (5) business-day extension of time to file his Response to LULAC Plaintiffs’ Second Amended Complaint. District Attorney Garza does not seek this motion for delay, but for good cause. This motion will not

prejudice Plaintiffs as they do not oppose the relief requested. This extension is necessary to permit District Attorney Garza and his counsel sufficient time to further explore the appropriate responsive pleading to be filed on behalf of District Attorney Garza at this time. The extension of time is warranted in the interest of justice, and to conserve the resources of the parties.

Pursuant to Local Rule CV-7(i), counsel for District Attorney Garza has conferred with Plaintiffs' counsel regarding the relief requested in the Motion. Plaintiffs do not oppose this extension.

II. CONCLUSION

For the foregoing reasons, the Court should grant District Attorney Garza's unopposed second motion for extension of time for his Response, up to and including March 11, 2022.

Respectfully submitted,
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**ATTORNEYS FOR DEFENDANT
JOSÉ GARZA, IN HIS OFFICIAL CAPACITY
AS TRAVIS COUNTY DISTRICT ATTORNEY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this motion was served through the Court's CM/ECF Document Filing System upon each attorney of record and the original upon the Clerk of Court on this the 4th day of March, 2022.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorneys

CERTIFICATE OF CONFERNCE

I certify that on March 4, 2022, counsel for Travis County District Attorney José Garza conferred with Plaintiffs' counsel, regarding the filing of Travis County District Attorney José Garza's Unopposed Motion for Extension of Time to File Response to LULAC Plaintiffs' Complaint. Counsel for Plaintiffs indicated she is UNOPPOSED to this motion.

/s/ Anthony J. Nelson
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Assistant County Attorney